

### Remarks

Claims 1-12, 19-20, 22-28, 30 and 32-46 are pending in the application.

Claims 1-6 are rejected under 35 U.S.C. 102(b) as being anticipated by Murata (U.S. Patent No. 4,935,665).

Murata discloses an array of LEDs that each have a lens element 31 that is described as being *convex*, see col. 4, lines 29-31. Convex is defined in Webster's as being 'curved or rounded.' The reference to Figure 1 cannot be relied upon with referring to the associated description, which describes the lens as convex.

However, the office action states that the lens 31 of Murata 'includes a curved surface and a flat surface...' This seems to result from different interpretations of the term each lens having 'a compound shape...' Therefore, Applicants have amended claim 1 to more clearly show that the lens has a curved portion and a flat portion on the same surface. The lens of Murata is curved (convex) and has no flat portion.

Applicant submits that the claims 1-6 are patentably distinguishable over the prior art and request allowance of these claims.

Claims 1-12, 19-20, 22-28, 30 and 32-46 are rejected under 35 U.S.C. 103(a) as being unpatentable over Latz et al (U.S. Patent No. 4,603,496), and further in view of Mize (U.S. Patent No. 6,328,456).

Contrary to the statements in the office action, Latz does not teach a lens that has a flat surface. The lens 15 is clearly rounded along its entire surface. Applicant assumes the flat surface being referred to was not the portion *between* lenses as that is not part of a lens. The lens 15 is clearly shown in the specification to be that portion that is rounded. As referred to in the specification of Latz, the lens elements are referred to as being convex, col. 2, lines 52-55. Indeed, the back side of the lens is also referred to as being 'domed,' so the argument applied with regard to Murata above is not applicable here.

The office action continues on to state, "Mize specifically teaches a lens with a curved surface...with a flat surface perpendicular to the center line...." However, Mize does not teach that the refractive/reflective element 32 is arranged to 'collimate the light...' as was required by claim 1 prior to amendment and is required by claims 30 and 42 as amended here. Mize specifically teaches away from this arrangement, as set out in Mize at col. 3, lines 57-59, being directed to "the surface 32 to create a wide cone of intense light..."

Therefore, the combination of references not only does not teach all of the elements of the claimed invention, it actually explicitly teaches away from the invention as claimed.

Further, the combination of Latz with Mize is invalid, as Mize teaches away from Latz. If Latz is directed to collimating the light from the electronic display, Mize would render that inoperable, as Mize would attempt to spread the light over a wide cone. Applicant believes that Latz is also directed to spreading the light, as the lens structures are convex, resulting in spreading the light, rather than collimating it.

No new matter has been added by this amendment. For the foregoing reasons, reconsideration and allowance of all pending claims of the application as amended is requested. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

**Customer No. 20575**

Respectfully submitted,

MARGER JOHNSON & McCOLLOM, P.C.



---

Julie L. Reed

Registration No. 35,349

210 SW Morrison Street, Suite 400  
Portland, OR 97204  
503-222-3613